

HAITI TERMINATION: DISCOVERY

PARTIES' PROPOSED CUSTODIANS, DATE RANGES AND SEARCH TERMS

I. RFPs (SET ONE)

A. Date Range

Plaintiffs' Proposal

From the date of the last search through November 28 (date of publication of Federal Register notice)

Defendants' Proposal

July 15, 2025 to 4 weeks before decision on November 19, 2025

B. Search Terms

Plaintiffs' Proposal

["Temporary Protected Status" OR "TPS" OR "1254a"] AND ["Haiti"]

Defendants' Proposal

["Temporary Protected Status" OR "TPS" OR "1254a"] AND ["Haiti"] *AND ("national interest") OR ("extraordinary and temporary") or (saf* w/3 "return")*

C. Custodians

Stipulated Custodians

1. Individuals Who Have Signed Relevant Records of Clearance and Approval (including decisions to terminate and/or publish the termination decision)
2. Kristi Noem, DHS Secretary
3. DHS Secretary Kristi Noem's Executive Secretary
4. Rob Law, ~~DHS Senior Counselor & Nominee for~~ DHS Undersecretary, Office of Strategy, Policy and Plans
5. Joseph Mazzara, former Acting General Counsel
6. Joe Edlow, USCIS Director
7. Samantha Deshommes, Chief of USCIS Office of Policy & Strategy (OP&S)
8. Sasha Ridley, OP&S Security, Public Safety & Global Vetting Division
9. Ofira Honig, OP&S Policy Analyst ~~{role}~~
10. Ted Kim, Refugee, Asylum and International Operations Directorate (RAIO) Associate Director
11. Rebecca Tanner, RAIO Research and TRIG Division Chief ~~{role}~~
12. Emma Krichinsky, RAIO Research Branch Chief ~~{role}~~

13. James Percival, DHS General Counsel

~~12.14.~~

Confirm that those without defined role captures Plaintiffs' request for: a) Policy Advisors involved in drafting USCIS Decision Memo for Haiti; and b) RAIO personnel involved in country conditions review for Haiti.

Plaintiffs' Proposal

Additional Custodians:

1. Corey Lewandowski, DHS Senior Advisor
- ~~2. James Percival, DHS General Counsel~~
- ~~3.2.~~ Christina McDonald, Associate General Counsel for Regulatory Affairs
- ~~4.3.~~ Nader Baroukh, Office of General Counsel
- ~~5.4.~~ Rena Cutlip Mason, USCIS OP&S Humanitarian Affairs Division Chief
- ~~6.5.~~ Kika Scott, former USCIS Director

Defendants' Proposal

No additional custodians

II. RFP (SET TWO)

A. Date Range

Plaintiffs' Proposal

January 20 – November 28

Defendants' Proposal

~~No counterproposal~~ July 15, 2025 to November 19, 2025

B. Search Terms

Plaintiffs' Proposal

[“Temporary Protected Status” OR “TPS” OR “1254a”] AND [guidance OR policy OR process OR procedure OR “Decision Memo*” OR “country conditions” OR “State” OR “periodic review” OR statute OR interpretation OR requirement* OR “national interest”]

Defendants' Proposal

~~No counterproposal~~

[“Temporary Protected Status” OR “TPS” OR “1254a”] w/10 [guidance OR policy OR process OR procedure OR “Decision Memo*” OR “country conditions” OR “periodic review” OR requirement* OR “national interest”]

C. Custodians

Plaintiffs’ Proposal

1. Rob Law, DHS Undersecretary, Office of Strategy, Policy and Plans (OSPP)
2. James Percival, DHS General Counsel
3. Joe Edlow, USCIS Director
4. Samantha Deshommes, USCIS Office of Policy & Strategy (OP&S) Director
5. Rena Cutlip Mason, OP&S Humanitarian Affairs Division Chief
6. Ted Kim, USCIS RAIO Associate Director
7. Corey Lewandowski, DHS Senior Advisor
8. Joseph Mazzara, former General Counsel
9. Christina McDonald, Associate General Counsel
10. Jennifer Higgins, former USCIS Director
11. Kika Scott, former USCIS Director
12. Aaron Calkins, USCIS Chief of Staff to Director
13. Shaila Mahmoudi, OP&S Deputy Chief
14. David Cloe, OSPP

Defendants’ Proposal

1. Rob Law, DHS Undersecretary, Office of Strategy, Policy and Plans (OSPP)
2. Joe Edlow, USCIS Director
3. Samantha Deshommes, USCIS Office of Policy & Strategy (OP&S) Director
4. Ted Kim, USCIS RAIO Associate Director

No counterproposal